

EXHIBIT

“D”

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

IN RE: ETHICON, INC. PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION	Master File No. 2:12-MD-02327 MDL No. 2327
THIS DOCUMENT RELATES TO: <i>Lesa Adams v. Ethicon, Inc., et al.</i> Case No. 2:12-cv-07658	JOSEPH R. GOODWIN U.S. DISTRICT JUDGE

**PLAINTIFF'S DESIGNATION AND
DISCLOSURE OF CASE-SPECIFIC EXPERT WITNESSES**

Pursuant to Pretrial Order (PTO) # 248, Rule 26 (a)(2) of the Federal Rules of Civil Procedure, Plaintiffs in the above-captioned civil action ("Plaintiffs") submit the following Designation and Disclosure of Case-Specific Expert Witness and persons who may provide expert testimony specific to Plaintiff's case pursuant to Rule 702 of the Federal Rules of Evidence.

RETAINED EXPERT WITNESSES

- 1) Dr. Dionysios Veronikis (Urogyn) (adoption of report served)
St. Johns Mercy Medical Center
Tower B
621 S New Ballas Rd
#2002-B
St. Louis, MO 63141
- 2) Dr. Bruce Rosenzweig (Urogynecologist) (adoption of report served)
Rush University Professional Building
1725 West Harrison Street, Suite 358
Chicago, IL 60612
- 3) Prof. Dr. med. Uwe Klinge (Materials) (adoption of report served)
KLINIK FÜR ALLGEMEIN-, VISZERAL- UND
TRANSPLANTATIONSSCHIRURGIE
RWTH Aachen und Universitätsklinikum Aachen
Pauwelsstraße 30
D-52074 Aachen
Germany

- 4) Dr. Paul Michaels (Pathologist) (adoption of report served)
4214 Speedway
Austin, TX 78751
- 5) William Porter, M.D. (Urogynecologist) (Case Specific Causation)
Presbyterian Urogynecology
6324 Fairview Rd., Ste. 390
Charlotte, NC 28210
- 6) Dr. Anne Wilson (FMEA) (adoption of report served)
QA Consulting, Inc.
7500 Rialto Blvd.
Bldg. 1, Ste. 225
Austin, TX 78735

NON-RETAINED EXPERT WITNESSES

NAME	ADDRESS	SPECIALITY
Dr. Michael J. England Elizabeth Weaver, WHNP Kristina Berryman, RN	Texas Healthcare 1250 8 th Ave., # 330 Fort Worth, TX 76104	OB/GYN
Dr. Ruston Jennings	1318 Paluxy Road Granbury, TX, 76048	Internal Medicine
Dr. Jennifer L. Motley	5801 Oakbend Trl, Ste 180 Fort Worth, TX 76132	OB/GYN
Dr. David Rahn Laurie Marroquin, RN Deborah Lawson, WHNP	5323 Harry Hines Blvd. Dallas, TX 75390	OB/GYN
Dr. Steve Suba	6100 Harris Pkwy, #235 Fort Worth, TX 7613	OB/GYN
Dr. C. Brooks Smith	805 Hill Blvd. #104 Granbury, TX 76048	Family Medicine
Dr. David B McAlpine	7100 Oakmont Blvd Suite 102 Fort Worth, TX 76132	OB/GYN
Dr. William Maxwell	1250 8th Ave. Fort Worth, TX 76104	OB/GYN
Dr. Henry Nance	141 Westmeadow Dr.	General Surgery

	Cleburne, TX 76033	
Dr. Eberhard Samlowsky	220 Ridgeway Ct, #A Cleburne, TX 76033	Family Medicine
Dr. Donna Kolar	6100 Harris Parkway Suite Fort Worth, TX 76132	Specialty Health
Dr. Nancy Walsh	1318 Paluxy Road Granbury, TX 76048	Family Medicine
Dr. Suzanne Kreisberg	4770 Regent Blvd., Irving, TX 75063	Pathology
Dr. Rachel Place	805 Hill Blvd., Suite 104 Granbury, TX 76048	Specialty Health
Dr. Brittany Davidson Dr. Rachel Cook Dr. Sara Michgrub Shelia Martin, MA Dr. Brandon Swartz	UT Southwestern Medical Center 5323 Harry Hines Blvd. Dallas, TX 75390	Specialty Health
Dr. Amy J. Williamson Dr. Kyung J. Lee	Texas Health Care PLLC 923 Pennsylvania Ave., Suite 76104 Fort. Worth, TX 76104	Specialty Health
Dr. Gerald L. Kiel	Family Medicine Associates, P.A. 1208 W. Henderson, Cleburne, TX 76032	Specialty Health

A General Designation and Disclosure has been or is being served by and on behalf of the wave 5 cases for general expert opinions. In the event that any of the general expert(s) identified above is/are unavailable for trial in this case, Plaintiffs reserve the right to elicit testimony, either through direct examination or cross-examination, of other of the general witnesses designated or identified by Plaintiffs. In no event, however, will Plaintiffs' retained experts at trial exceed five (5) experts without leave of Court for good cause shown; however, since Plaintiff was implanted with two products, Plaintiff has identified six (6) necessary expert witnesses herein. Plaintiffs further reserve the right, as allowed by Rule 26(e) of the Federal Rules of Civil Procedure, to supplement this Designation and Disclosure of Expert Witnesses through the discovery process upon receiving additional discovery including, but not

limited to, expert depositions, fact depositions, exhibits introduced in depositions, documents produced, and any supplemental expert disclosures by any party.

Dated this 22nd day of May, 2017

Respectfully submitted,

/s/ Ryan L. Thompson

Ryan L. Thompson

Texas State Bar No. 24046969

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